

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

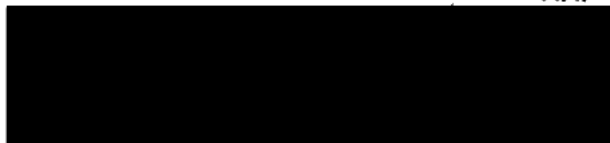


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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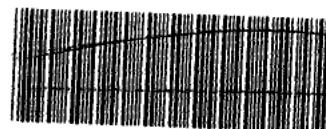
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Ms. Sharon Laas
E.I. Dupont de Nemours & Company, Inc.
P.O. Box 80713
Wilmington, DE 19880-0713

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Re: P-95-979/980/981



50950005521

Dear Ms. Laas:

This letter responds to the above-referenced Premanufacture Notices (PMN) received by the Environmental Protection Agency (EPA) on March 28, 1995.

The notice review period for these PMN substances will expire on June 25, 1995. Based on the information available to EPA at the time of its review, the Agency has not determined that the manufacture, processing, use, or disposal of these substances (in the manner described in your PMNs) may present an unreasonable risk of injury to human health and the environment. As a result, you will be free to manufacture or import these substances when the notice period has expired. Although the Agency has not taken action to control exposure to or releases of these substances, there were serious concerns raised for these substances during the review process. Specifically, Agency reviewers identified potential concerns for skin corrosion. The decision not to regulate the PMN substances at this time was based on the fact that any exposed workers will be warned of potential corrosion and are expected to wear protective equipment.

EPA expects that, to mitigate dermal exposure, any workers who may be exposed to the substances during manufacturing, processing, and use will continue to wear impervious gloves, goggles, and clothing as specified in the MSDS for the PMN substances.

This letter also serves to confirm, pursuant to 40 CFR 721.170(d)(2), the oral notification provided to you concerning the Agency's intent to issue a significant new use rule ("SNUR") under Section 5(a)(2) of the Toxic Substances Control Act ("TSCA") for the chemical substances described in the PMNs referenced above. The pertinent regulations are found at 40 CFR Part 721. This action is being considered because of environmental toxicity based on analogy of the PMN substances to a [redacted] [redacted] [redacted].

Based on these data, EPA expects toxicity to aquatic organisms at surface water concentrations as [redacted]

CONCURRENCES

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similar substance, developmental toxicity based on branched carboxylic acids, and lung toxicity due to surfactancy, to workers who are exposed by inhalation to the PMN substances.

Although EPA does not expect significant inhalation exposure or release to surface waters based on the use of the substances as described in the PMNs, if the use were to change the potential for inhalation exposure and environmental release could change correspondingly. Consequently the Agency intends to issue a SNUR in which the restrictions in 40 CFR 721.90(a)(1), (b)(1), (c)(1) and 721.80(v)(2), (w)(2), and (x)(2) will apply to these substances. The SNUR will require submission of a notice to EPA 90 days before any predictable or purposeful release to water of the substances and any manufacturing, processing, or use of the substances as a solid occur. The SNUR will apply to your Company, your customers for these substances, and any other manufacturer, importer, or processor of these substances.

Please note however, that 40 CFR 720.102 requires you, within the first 30 days of commencement of manufacture or import of the PMN substances, to send a notification letter to the Document Control Officer (7407), Office of Pollution Prevention and Toxics, U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460. The notification letter must contain the following information on the PMN substances: specific chemical identity, premanufacture notice number, and the date when the manufacture or import commences. This information will be used to add the new substances to the TSCA Chemical Substances Inventory.

If you have any questions or comments, please contact Jim Alwood, the Program Manager responsible for these PMNs, at (202) 260-1857.

Sincerely,

/s/
Paul J. Campanella, Chief
New Chemicals Branch